

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Section 63.71 Application of
Verizon New York Inc. and
Verizon New Jersey Inc.

For Authority Pursuant to Section 214 of
the Communications Act of 1934, As Amended
To Discontinue the Provision of Service

WC Docket No. 13-150
Comp. Pol. File No. 1115

COMMENTS OF QUALCOMM INCORPORATED

QUALCOMM Incorporated (“Qualcomm”) hereby submits these brief comments in support of Verizon New York Inc. and Verizon New Jersey Inc. (collectively, “Verizon”) to grandfather and discontinue interstate wireline phone service in certain isolated portions of Fire Island, New York, and the Barrier Islands of New Jersey, where Verizon’s copper facilities were destroyed or rendered inoperable by the devastation caused by Superstorm Sandy and where the new deployment of wireline facilities is impractical. In these limited areas, Verizon provides 4G LTE wireless service, as well as a so-called wireless local loop-type service known as Verizon Voice Link, which uses wireless connectivity outside a home or business, but existing wireline phones within the home or business.

This is quite a unique situation. As the Commission well knows, Superstorm Sandy devastated the telecommunications infrastructure in many parts of New York and New Jersey, and wireless and wireline carriers, including Verizon and its competitors, made herculean efforts to restore service as quickly and as broadly as possible. Verizon has determined that it is simply

impractical to restore copper-based wireline service in a few particular areas in which the network was destroyed by Sandy — portions of Fire Island in New York and the Barrier Islands of New Jersey. Particularly given these unique circumstances, the Commission should not second-guess Verizon’s technology decision or dictate investment in outdated copper-based technology in view of the tremendous proliferation of wireless technology in New York and New Jersey as well as the entire United States.

According to the most recently available data, U.S. wireless penetration is 102.2%.¹ As of 2011, just 9.3% of households in New Jersey (excluding Essex County) had only landline phones, and just 11.9% of households in New York State (excluding New York City) were landline-only.² There is no question that New York, New Jersey, and the rest of the nation are going wireless, and this trend is accelerating rapidly. Fortunately, the FCC recognizes this undeniable trend and is fostering the proliferation of wireless technology through many policy initiatives. In light of the unique circumstances present here, wireless technologies, including the 4G LTE and the wireless local loop technology provided through Voice Link, are practical replacements for the copper-based phone service, which was the only means of telephony decades ago. Indeed, today’s wireless services benefit the public in countless ways.

For these reasons, Qualcomm respectfully requests that the Commission grant the instant application filed by Verizon.

¹ See “U.S. Quick Wireless Facts” *available at* <http://www.ctia.org/advocacy/research/index.cfm/aid/10323>.

² See “Wireless Substitution: State Level Estimates From the National Health Interview Survey, 2010-2011” *available at* <http://www.cdc.gov/nchs/data/nhsr/nhsr061.pdf>.

Respectfully submitted,

QUALCOMM INCORPORATED

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Certificate of Service

I, Dean R. Brenner, hereby certify that on this 29th day of July, 2013, two copies of the foregoing document were sent via First Class U.S. mail to:

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